

FILED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JAN 10 2020

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY  DEPUTY

UNITED STATES OF AMERICA,

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v.

CRIMINAL NO. 1:18-CR-346-RP

RODNEY GLENN GREEN,
a.k.a. Rodney Glen Fayson,

Defendant.

§

JOINT MOTION TO ADMIT A STIPULATION

The Government and defense have conferred and agreed to a factual stipulation. The parties therefore ask that the Court enter the stipulation below into evidence in this case and instruct the jury to consider it as true and correct without the need for additional evidence.

Stipulation:

The parties agree that the following facts are true and correct.

1. On January 8, 2020, Cassidy Gamez testified in part that:
 - a. She did not receive a phone call from law enforcement regarding Green's storage locker.
 - b. She saw one lock on Green's storage locker.
 - c. She believed that there was never a time when two locks were on the door of Green's storage locker.
 - d. She did not go with law enforcement when the search warrant was executed on Green's storage locker.

Respectfully submitted,

JOHN F. BASH
UNITED STATES ATTORNEY

By:



/s/
MATT HARDING
GABRIEL COHEN
Assistant United States Attorneys

AGREED:



RODNEY GLENN GREEN
Defendant, proceeding *pro se*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Government's Motion has been hand-delivered on January 10, 2020 to *pro se* defendant Rodney Glen Green.

/s/
Matt Harding
Assistant United States Attorney